BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the matter of:

Numbering Resource Optimization CC Docket No. 99-200

Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

CC Docket No. 96-98

Telephone Number Portability

CC Docket No. 95-116

MOTION TO ACCEPT SUPPLEMENTAL DATA WITH RESPECT TO THE CALIFORNIA PUBLIC UTILITIES COMMISSION AND THE PEOPLE OF THE STATE OF CALIFORNIA'S PETITION FOR WAIVER OF THE FEDERAL COMMUNICATION COMMISSION'S CONTAMINATION THRESHOLD RULE

I. INTRODUCTION

A Petition For Waiver of the Federal Communication Commission's (FCC)

Contamination Threshold Rule in the above-reference matter was filed on behalf of the California Public Utilities Commission (CPUC), and the People of the State of California on September 5, 2002. In support of its position to increase the contamination threshold, California initiated a study to identify the number of thousand-blocks contaminated between the existing 10 percent threshold and California's proposed 25 percent threshold.

This study was identified as the "Contamination Study" and was attached to the petition for waiver. The CPUC noted in its petition, however, that the Contamination Study reflected information gathered as of December 31, 2001. We further stated that updated NRUF information was unavailable until September 2002, and that the CPUC would provide the FCC with an updated study once the new NRUF data had been received and analyzed. Attached is the updated data derived from the June 30, 2002 Numbering Resource Utilization/Forecast (NRUF) Report. (See attached Supplemental Contamination Study). This Supplemental Study reflects the number of blocks contaminated over 10 to 25 percent as of June 30, 2002. As referenced in the Supplemental Study, available numbers are actual available numbers reported by the carriers in the June 30, 2002 NRUF for those blocks identified as contaminated over 10 percent to 25 percent.

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¹ See CPUC's Petition for Waiver, filed September 5, 2002, p. 4, FN 8.

² See CPUC Petition's for Waiver, filed September 5, 2002, p. 4. FN 8.

II. CONCLUSION

For the reasons stated above, the CPUC requests that the FCC permit the CPUC's Motion to Accept Supplemental Data, with respect to the CPUC's requested waiver to implement the 25 percent contamination threshold.

Respectfully submitted,

GARY M. COHEN HELEN M. MICKIEWICZ LIONEL B. WILSON STACIE M. CASTRO

/s/ STACIE M. CASTRO

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October 17, 2002

ATTACHMENT

Myreline Cellular/PCS Total # of Blocks Available #'s # of Blocks Available #'s # of Blocks # of Blocks Total 192 149,177 112 91,382 304 204 249 206,796 10 8,219 259 259 249 276,535 31 26,560 361 259 254 186,622 58 49,130 259 259 257 226,786 108 88,421 394 252 266 256,786 108 88,421 394 252 267 222,947 79 65,034 346 252 267 222,947 79 64,382 344 252 267 222,947 75 64,382 352 254 267 222,947 75 64,384 357 254 270 224,914 67 54,884 357 254 281 <th></th> <th>Blocks Conta</th> <th>Blocks Contaminated Over 10% to 25%</th> <th>25%</th> <th></th> <th></th> <th></th>		Blocks Conta	Blocks Contaminated Over 10% to 25%	25%			
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5.871 4.881,533 1.430 1.181,174 7.301	949	187	154,963	35	28,693	222	183,656
	Total	5,871	4,881,533	1,430	1,181,174	7,301	6,062,707

Data derived from the June 30, 2002 Numbering Resource Utilization/Forecast (NRUF) Report. Available numbers are actual available numbers reported by the carriers in the 6/30/02 NRUF for those blocks identified as contaminated over 10% to 25%.